

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

GILBERT JAMES	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 3:11cv221
	)	
ENCORE CAPITAL GROUP, INC., <i>et al.</i>	)	
	)	
Defendants.	)	

**PLAINTIFF'S REFILED MOTION TO OVERRULE DEFENDANTS'  
PRIVILEGE OBJECTIONS AND TO COMPEL DISCOVERY RESPONSES AND  
UNOBSTRUCTED WITNESS TESTIMONY**

COMES NOW the Plaintiff, Gilbert James, by counsel, and for the reasons more fully set forth in the contemporaneously filed Memorandum of Law, he moves the Court for entry of an Order overruling the privilege objections asserted by the Defendants, and requiring full and complete answers to discovery, as well as unobstructed deposition testimony.

Respectfully submitted,  
**GILBERT JAMES**

By: \_\_\_\_\_/s/\_\_\_\_\_  
Of Counsel

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 7th day of March, 2012, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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